

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	X	
	:	
	:	Chapter 11
	:	
BIG LOTS, INC., <i>et al.</i> , ¹	:	Case No. 24-11967-JKS
	:	(Jointly Administered)
Debtors.	:	D.I. 450

**LIMITED OBJECTION OF RAYMOND STORAGE CONCEPTS, INC.
AND RAYMOND WEST INTRALOGISTICS SOLUTIONS
TO DEBTORS' NOTICE OF ABANDONMENT, UTILIZATION
AND DISPOSAL OF PERSONAL PROPERTY LOCATED AT CERTAIN
OF DEBTORS' LEASED DISTRIBUTION CENTERS**

Raymond Storage Concepts, Inc. and Raymond West Intralogistics Solutions (collectively, “**Raymond**”) hereby file this limited objection (the “**Objection**”) to Debtors’ foregoing notice (the “**Abandonment Notice**”), and in support hereof respectfully state as follows:

1. Raymond has a significant prepetition and post-petition relationship with Debtors pursuant to which Raymond has sold and leased industrial equipment and related accessories to one or more of the Debtors, and supplied extensive repair and maintenance services to industrial equipment utilized by Debtors in their operations.

2. Debtors engaged Raymond to dismantle and relocate from their distributions centers in Ohio and California listed in the Abandonment Notice and install such equipment in other facilities. This engagement is required to be completed by October 31, 2024, and only relates to industrial equipment required to be professionally assembled and laid down.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal identification number, are: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the Debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

3. Raymond is informed and believes Debtors will undertake to transfer to other facilities additional pieces of equipment and accessories that do not require professional dismantling and assembly, such as batteries and chargers. Certain such items were sold or leased by Raymond to Debtors, but Raymond does not know whether all such items will be relocated to other facilities or abandoned.

4. Raymond objects to the abandonment of any such property and permission to repossess the same for its use and benefit.

WHEREFORE, Raymond respectfully requests that this Objection be sustained and that they be granted such further and additional relief as may be equitable and just.

Dated: October 24, 2024
Lisle, Illinois

SWANSON, MARTIN & BELL, LLP

By: /s/ Charles S. Stahl, Jr.
Charles S. Stahl, Jr.
2525 Cabot Drive, Suite 204
Lisle, IL 60532
T: 630-780-8472
F: 630-799-6901
Email: cstahl@smbtrials.com

CERTIFICATE OF SERVICE

I, Charles S. Stahl, Jr., hereby certify that on October 24, 2024, I caused the foregoing Objection to be served on each of the Objection Service Parties as identified in the Abandonment Notice via the Court's CM/ECF notice.

Dated: October 24, 2024

/s/ Charles S. Stahl, Jr.
Charles S. Stahl, Jr.